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Attorneys for Court-Appointed Receiver
Colliers International NJ, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED HOLDERS OF AMHERST PIERPOINT COMMERCIAL MORTGAGE SECURITIES, LLC, MULTIFAMILY MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2019-SB59, *et al.*, : Civil Action No. 19-cv-17866 (MCA)(LDW)
: *Document Electronically Filed*
: **NOTICE OF MOTION FOR ORDER APPROVING SALE OF CERTAIN REAL PROPERTY FREE AND CLEAR**
Plaintiffs, : **ORAL ARGUMENT REQUESTED**
vs. :
SETH LEVINE, *et al.*, : **Motion Day: July 19, 2021**
Defendants. :
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TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, on July 19, 2021, or as soon thereafter as counsel may be heard, the undersigned counsel for Colliers International NJ LLC, the Court-appointed Receiver for the properties that are subject of the referenced actions (the “Receiver”), shall move before the Honorable Madeline Cox Arleo, U.S.D.J., District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order approving Receiver’s sale of the real property owned by Defendant Aljo Norse LLC, free and clear of all prior encumbrances, liens, rights, and interest, approving the Receiver’s

disbursement of proceeds from the sale, and for related relief, pursuant to the prior Orders of this Court and Fed. R. Civ. P. 66.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Receiver shall rely on the accompanying Declarations of Richard Madison, Joseph Brecher, and Jaimee Katz Sussner, Esq., with accompanying exhibits, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Receiver's Motion is enclosed herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), the Receiver hereby requests oral argument only if opposition is filed.

Respectfully submitted,

s/ Jaimee Katz Sussner
JAIMEE KATZ SUSSNER

*Attorneys for Court-Appointed
Receiver Colliers International
NJ LLC*

Dated: June 14, 2021

SERVICE LIST

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11. Toledo Plumbing & Heating Inc. (*Via First Class Mail*)
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12. State of New Jersey (*Via First Class Mail*)
Judgment Processing Service
Superior Court Clerk's Office
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